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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PENDLETON DIVISION

HELLS CANYON PRESERVATION COUNCIL,
an Oregon non-profit corporation, and **OREGON**
WILD, an Oregon non-profit corporation,

Plaintiffs,

vs.

KRIS STEIN, in her official capacity as District
Ranger of the Eagle Cap Ranger District, Wallowa-
Whitman National Forest, and **UNITED STATES**
FOREST SERVICE, and agency of the United
States Department of the Agriculture,

Defendants,

and

WALLOWA COUNTY,

Defendant-Intervenor.

Case No. 2:17-cv-00843-SU

DECLARATION OF NILS
CHRISTOFFERSEN IN OPPOSITION
TO PLAINTIFFS' MOTION FOR
INJUNCTION PENDING APPEAL

I, Nils Christoffersen, under threat of penalty of law and pursuant to 28 U.S.C. § 1746 and upon personal knowledge, do hereby declare as follows:

1. I make this declaration based on my personal knowledge and in opposition to plaintiff's motion for injunction pending appeal.

2. I am the Executive Director of Wallowa Resources based in Enterprise, Oregon. Wallowa Resources is a non-profit organization which strives to maintain working lands, sustain rural lifestyles, and create local jobs from the stewardship of natural resources. I have served as the Executive Director of Wallowa Resources since 2007. Prior to my position as Executive Director, I began working for Wallowa Resources in 1999 to develop Wallowa Resources Field Programs and was later promoted to Deputy Director in 2002.

3. I am a graduate of both Williams College (B.A. Economics) and Oxford University (M.S. Forestry). I have served on many local and national boards - including the National Commission on Science for Sustainable Forestry. I currently serve on the Oregon Board of Forestry and World Forest Center's Board of Directors. I also served on the Enterprise School District Board from 2004-2017.

4. Wallowa Resources believes that thriving rural communities need strong economies, a commitment to land stewardship, and top-notch learning opportunities. Its mission is to develop, promote, and implement innovative solutions to help the people of Wallowa County and the Intermountain West sustain and improve their communities and their lands. We work to revitalize rural communities, especially Wallowa County and have become a national model for community-based solutions. Our stewardship work unites the land, community, and economy. We work to improve working lands and honor Wallowa County's heritage of making

a living from the land. We do this through husbandry, conservation, and care and by promoting sustainable forestry, ranching, and agriculture practices.

5. Wallowa Resources supports the Lostine River Corridor Public Safety Project because our understanding is that 100% of the project is designed to reduce public risk from wildfire by reducing the amount and continuity of fuels at various scales across the project area and by facilitating emergency response in the event of a wildfire. The project will break up current forest fuels into discontinuous patches that will dampen future, unpredictable wildfire behavior and make those fires easier to manage.

6. The Lostine River Corridor has a complex history of fire but put simply, the commercial logging contemplated by the project protects older, fire-resistant trees and selectively removes younger, fire-intolerant trees. Wallowa Resources believes this approach is the surest way to protect large, mature, fire-resistant trees and stands from drought, insect, and disease stress, and from fire risk posed by the dense, over-stocked stands containing an abundance of secondary growth of species more vulnerable to fire. The Lostine River Corridor Public Safety Project is not an industrial logging project but rather designed to be a selective harvest operation aimed at producing numerous benefits to forest health and public safety, and minimizing impacts to scenery and wildlife habitat.

7. In my experience and expertise, the Lostine River Corridor area is naturally more dense and moist than surrounding uplands. The Forest Service is proposing to treat a limited portion of the Lostine Corridor to help return it to its original natural condition where future fire is more likely to burn without causing widespread mortality of old trees. Restoring the natural fire regime is particularly important because all of eastern Oregon, including the Lostine River Corridor, is projected to become warmer and drier due to climate change. In my opinion, this

will not likely render the Lostine River Corridor a refugia from fire, but will increase the likelihood of wildfire. Judicious thinning and prescribed burning in fire prone forests like those in the Lostine River Corridor can help restore natural fire regimes and resistant/resilient forests. Several fires over the past three summers across Oregon have proven the efficacy of fuel reduction treatments, which help keep fires from the canopy and provide a chance for fire suppression efforts.

8. Wallowa Resources believes federal forest restoration needs across rural Wallowa County, including wildlife habitat, watershed protection, forest health, and forest fuel reduction are significant. Our organization believes that it is critical that those who value national forests work together to balance individual values about any particular place with the broader risks to ecological function and conditions. Otherwise, there is risk in losing many old trees, wildlife habitat, and sensitive plants.

9. The Lostine River will also benefit from conditions that allow more low- and moderate-severity fire to occur. Wallowa Resources supports the project because of the public safety and forest health benefits that should result from project design. It is limited in scope, and if done properly, will provide benefits to the project area without dramatic negative consequences.

10. I understand plaintiffs are making an argument that the Lostine River Corridor serves as a refugia from wildfire and that the planned treatments will open up the forest floor, drying out fuels and actually increasing the risk of fire to the area. From my perspective, I view the fire management and public safety aspects of the Lostine Project differently. The treatments proposed by the Forest Service will help to moderate future fire behavior by removing ladder fuels and facilitating prescribed fire thereby reducing surface fuels. The end result is less fuel,

less continuity of fuel, and less severe fire effects. Fuels desiccate even under a forest canopy during periods of high temperatures and low relative humidity regardless of canopy cover. Removing small trees, and reducing the number of stems per acre, will increase the water available to residual trees thus making them less prone to mortality from fire, drought and insects. There is broad scientific agreement that removing small trees, and reducing stand density, will moderate fire behavior and give fire managers more flexibility both when re-introducing fire and when managing the inevitable wildfire.

Pursuant to 28 U.S.C. § 1746, I declare, under penalty of perjury, that the foregoing is true and correct.

Dated this 19th day of October, 2018.



Nils Christoffersen

CERTIFICATE OF SERVICE

I, Caroline Lobdell, hereby certify that I, on October 22, 2018, I caused the foregoing to be served upon counsel of record through the Court's electronic service system.

Dated this 22nd day of October, 2018.

/s/ Caroline Lobdell
Caroline Lobdell